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October 9, 2015

**VIA ECF**

Honorable Magistrate Judge James Orenstein  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**RE: Index No. 1:14-cv-04087-JG-JO  
Yossef v. Greystone Alliance LLC**

Dear Honorable Magistrate Judge Orenstein:

I represent the plaintiff in the above referenced matter. On March 12, 2015, a Clerk's Entry of Default was entered. On April 6, 2015, Your Honor cancelled the pretrial conference previously scheduled for April 7, 2015 in light of the default of Defendant Greystone Alliance LLC. On August 17, 2015, Your Honor ordered that Plaintiff file a motion for default judgment no later than September 14, 2015. On September 22, 2015, Your Honor issued a Report and Recommendations respectfully recommending that the court dismiss the Complaint with prejudice. Your Honor provided my office until October 9, 2015 to object to the Report and Recommendation.

In observance of the Jewish holidays, my office has been closed for 2 days each week for the past 4 weeks, so I apologize for this last minute filing.

I am writing to respectfully object to the Report and Recommendation. Your Honor's ruling and the facts of the case in *Setton v. Greystone Alliance LLC*, 1:13-cv-06230-CBA-JO has just come to our attention. Due to the evasive

and fraudulent actions of the Defendant and its principal Ed Carfora who are now relocated in Illinois, Plaintiff respectfully requests leave to amend its complaint and add Ed Carfora, Greystone Alliance LLC and Glass Mountain Capital, LLC as defendants and serve same on the defendants within 45 days.

Furthermore, as Ed Carfora has a history of evading service and refusing to accept service at his place of employment by conveniently stating “he has nothing to do with Greystone”, Plaintiff respectfully requests an Order to permit service at his place of residence, via personal service upon a person of suitable age and discretion, or upon due diligence.

Thank you for Your Honor’s time and attention to this matter.

Very truly yours,

/s/ Maxim Maximov

Maxim Maximov, Esq.